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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
  
DISTRICT OF OREGON  
  
EUGENE DIVISION

DEREK JOHNSON, personal representative  
for the Estate of Rocky Stewart, deceased,

Case No.: 6:19-cv-01883-AA

Plaintiff,

v.

WELLPATH, LLC, a Delaware corporation;  
CORRECT CARE SOLUTIONS, LLC, a  
Kansas corporation; COOS COUNTY, an  
Oregon county; PATRICIA SAUERBRY, an  
individual; DANIEL RYMER, an individual;  
MARK MAHLUM, an individual; ROBERT

**PLAINTIFF'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO FILE  
REPLY TO THE WELLPATH  
DEFENDANTS' RESPONSE TO  
PLAINTIFF'S MOTION FOR  
SANCTIONS**

KRAMER, an individual; JIMMY LAY, an individual; SAMUEL ELEY, an individual; and JOHN DOES 1-9,

\_\_\_\_\_  
Defendants.

**I. CERTIFICATE OF COMPLIANCE WITH LR-7(a)**

The undersigned attorney certifies that he conferred via phone or email with the attorneys for all defendants concerning this motion. Defendants do not oppose this motion.

**II. MOTION**

Pursuant to Fed. R. Civ. P. 6(b) and LR 16-3, Plaintiff moves the Court for an order extending the deadline for Plaintiff's Reply to the Wellpath Defendants' Response to Plaintiff's Motion for Sanctions from May 5, 2023, to May 12, 2023. Plaintiff is unable to complete its reply within the normal 14-day window due to the complexity of the motion and corresponding evidence. The requested extension should not have an impact on any current deadlines in the case.

**III. CONCLUSION**

The Court should grant Plaintiff's motion.

DATED this 2<sup>nd</sup> day of May 2023.

s/ Paul Galm

Paul Galm, OSB #002600  
Of Attorneys for Plaintiff

s/ Josh Lamborn

Josh Lamborn, OSB #973090  
Of Attorneys for Plaintiff

s/ John Devlin

John Devlin, OSB #042690  
Of Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing REPLY TO DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR SANCTIONS on:

Kenny Montoya  
Law Offices of Montoya Hisel and Associates  
901 Capitol St. NE  
Salem, OR 97301  
Attorney for Defendants Coos County, Daniel Rymer, Mark  
Mahlum, Robert Kramer, Samuel Eley and Jimmy Lay

Brad Litchfield  
Jens Schmidt  
Hutchinson Cox LLC  
940 Willamette St Ste 400  
PO Box 10886  
Eugene OR 97440

Eric Schoonveld  
HPS Law  
200 South Wacker Drive  
Suite 3300  
Chicago, IL 60606  
Attorneys for Defendants Wellpath, LLC; Correct Care  
Solutions; and Patricia Sauerbry

by the following indicated method or methods:

- ☒ by **electronic means through the Court's Case Management/Electronic Case File system** on the date set forth below;
- ☒ by **emailing** a copy thereof to Brad Litchfield's, Eric Schoonveld's and Kenny Montoya's last-known email address on the date set forth below;

by **mailing** a full, true, and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to defendants' attorneys Brad Litchfield's, Eric Schoonveld's and Kenny Montoya's at their last-known addresses listed above and depositing it in the U.S. mail in Portland, Oregon on the date set forth below.

DATED this 2<sup>nd</sup> day of May 2023.

s/ Paul Galm  
Paul Galm, OSB #002600  
Of Attorneys for Plaintiff

s/ Josh Lamborn

Josh Lamborn, OSB #973090  
Of Attorneys for Plaintiff

s/ John Devlin

John Devlin, OSB #042690  
Of Attorneys for Plaintiff